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**Scharf-Norton Center for
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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DANIEL Z. CROWE; OREGON CIVIL
LIBERTIES ATTORNEYS; and LAWRENCE
K. PETERSON,

Plaintiffs,

v.

STATE BAR OF OREGON,

Defendant,

Case No. 3:18-cv-02139-JR

**PLAINTIFFS' UNOPPOSED
MOTION TO EXTEND DEADLINES**

Pursuant to Fed. R. Civ. P. 6(b), Plaintiffs Daniel Z. Crowe, Oregon Civil Liberties Attorneys, and Lawrence K. Peterson respectfully request a 90-day extension of time for the following deadlines:

- 1) Deadline to file Joint ADR Report currently scheduled for October 12, 2021, which would be extended to January 10, 2022;
- 2) Deadline to complete fact discovery currently scheduled for October 12, 2021, which would be extended to January 10, 2022;
- 3) Deadline for dispositive motions currently scheduled for November 12, 2021, which would be extended to February 10, 2022;
- 4) Deadline for Pretrial Order currently scheduled for December 12, 2021 (or 30 days after a ruling on dispositive motions, whichever is later), which would be extended to March 12, 2022 (or 30 days after a ruling on dispositive motions, whichever is later).

Plaintiffs seek extension of these deadlines due to Defendants' production of 163,096 pages of documents on October 5, 2021. The review and analysis of these documents will take significant time and effort by Plaintiffs' counsel. Plaintiff may then need to make follow-up discovery requests or conduct depositions. This extension is not requested for purposes of delay and will not cause prejudice to any party.

The undersigned attorney for Plaintiffs conferred with Defendants' counsel regarding this motion, and Defendants' counsel confirmed that Defendants do not oppose this motion. This is the first extension of time for completion of discovery that Plaintiff has requested.

Plaintiffs therefore respectfully request a 90-day extension of time for the above-referenced deadlines to ensure that the discovery can be properly reviewed and analyzed before discovery closes and the parties file dispositive motions.

RESPECTFULLY SUBMITTED this 8th day of October, 2021 by:

/s/ Jacob Huebert

Jacob Huebert (Appearing *pro hac vice*)

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at the GOLDWATER INSTITUTE**

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Document Electronically Filed and Served by ECF this 8th day of October 2021

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